

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

SCOTT D.H. REDMAN, individually and on	)	
behalf of all others similarly situated,	)	
	)	
Plaintiff,	)	No. 13 C 3810
	)	
v.	)	Judge Ellis
	)	
CITY OF CHICAGO,	)	Magistrate Valdez
	)	
Defendant.	)	

**JOINT MOTION TO SUSPEND FACT  
DISCOVERY DEADLINES PENDING SETTLEMENT**

Plaintiff Scott D.H. Redman (“Plaintiff”) and Defendant City of Chicago (“Defendant”), by their respective attorneys, and pursuant to Fed. R. Civ. P. 16(b)(4), jointly move this Court to suspend the fact discovery deadline of February 24, 2015. In support of this motion, the parties state as follows:

1. On January 27, 2015, this Court entered an order setting a fact discovery deadline of February 24, 2015. [DE 53].
2. The parties proceeded with further written and oral discovery.
3. The parties have now reached an agreement in principle to settle this matter on a class-wide basis and are in the process of documenting that agreement in a formal settlement agreement.
4. Additionally, the proposed settlement will first require City Council approval, then this Court’s approval.
5. While the parties have conducted sufficient fact discovery to reach an agreement in principle, they did not complete all fact discovery that would be necessary for a trial.

6. Therefore, the parties request that this Court suspend the current fact discovery deadline of February 24, 2015 indefinitely, with the parties' expectation that the parties will successfully settle this matter without need to revisit further fact discovery. However, the parties want to preserve the right to complete fact discovery if the proposed settlement is not completed and approved.

7. The Parties anticipate that they will be presenting a motion for preliminary approval of the proposed settlement within the next 60 days.

WHEREFORE, Plaintiff and Defendant request that this Court suspend the current fact discovery deadline indefinitely and grant such other relief as this Court deems proper.

SCOTT D.H. REDMAN, Plaintiff

CITY OF CHICAGO, Defendant

By: /s Paul F. Markoff  
One of Plaintiff's Attorneys

By: s/ Bart T. Murphy (with permission)  
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### **CERTIFICATE OF SERVICE**

I certify that I served a copy of this *Joint Motion to Suspend Fact Discovery Deadline Pending Settlement* on the following electronically by using the CM/ECF system on this 20th day of February, 2015:

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